EFACTS: 2420662

KEYSTONE CEMENT COMPANY

P.O. BOX A, BATH, PA 18014-0058 TELEPHONE (610) 837-1881

July 30, 2015

Mr. Mark J. Wejkszner, P.E.
Regional Air Quality Program Manager
Pennsylvania Department of Environmental Protection
2 Public Square
Wilkes-Barre, PA 18711-0790

AIR QUALITY

AUG 0 3 2015

FACILITY:
PERMIT #:
COUNTY:
FILE CODE:

Ms. Diana Escher, Director
Air Protection Division
USEPA, Region III
1650 Arch Street
Philadelphia, PA 19103-2029

Re: *Submittal of §63.10(d)(5)*
Periodic Startup, Shutdown, and Malfunction Report
For Units Subject to 40 CFR Part 63 Subpart LLL
For the period of January 01, 2015 through June 30, 2015
Keystone Cement Company, Bath, Pennsylvania

Dear Mr. Wejkszner and Ms. Escher:

Keystone Cement Company Bath, PA facility (Keystone) is submitting the enclosed periodic startup, shutdown, and malfunction (SSM) report for emission units subject to the requirements of 40 CFR Part 63 Subpart LLL – National Emissions Standards for Hazardous Air Pollutants from the Portland Cement Manufacturing Industry. Keystone is submitting this report for the semi-annual period from January 01, 2015 through June 30, 2015 in accordance with the requirements of 40 CFR §63.10(d)(5)(i). Pursuant to these requirements, a periodic SSM report is only required if a startup, shutdown, or malfunction (SSM event) caused the affected source to exceed the emission standards in §63.1344(a).

Keystone experienced SSM events for the units subject to emission standards in §63.1344(a) during the reporting period and is submitting this periodic SSM report in accordance with the requirements of §63.10(d)(5)(i).

If a periodic SSM report is required, the regulation specifies that the following information must be included:

- If actions taken by an owner or operator during a startup or shutdown (and the startup or shutdown causes the source to exceed any applicable emission limitation in the relevant emission standards), or malfunction of an affected source (including actions taken to correct a malfunction) are consistent with the procedures specified in the source's startup, shutdown, and malfunction plan (SSM Plan), the owner or operator must state such information in a startup, shutdown, and malfunction report. If actions taken by the owner or operator

during SSM events were consistent with the procedures specified in the source's SSM Plan the owner or operator must state such in the periodic SSM report.

For each SSM event that occurred during the reporting period Keystone followed the procedures specified in the facility's SSM Plan.

- The number, duration, and a brief description of each type of malfunction which occurred during the reporting period and which caused or may have caused an emission limit to be exceeded must be included.

A summary table of the malfunction that occurred during the reporting period where excess emissions may have resulted is attached. As previously stated, Keystone followed the procedures specified in the SSM Plan for all of the malfunction events.

Records of all startup and shutdown events, as well as malfunction events that caused excess emissions are maintained on-site as part of the facility operating record and are available for inspection. If you have any questions or require any addition information regarding this submittal please contact Scott McGoldrick at (610) 837-1881 ext. 3213 or at Scott.McGoldrick@gcpv.com.

By signing this letter, I certify that I am a responsible official as that term as defined 40 CFR §63.2. I further certify, based on reasonable inquiry that the enclosed report is to the best of my knowledge and belief true, accurate, and complete.

Sincerely,

Stephen P. Holt, P.E.
Vice President, Environmental Compliance

Enclosures

cc: Scott C. McGoldrick, Keystone

ATTACHMENT A - PERIODIC SSM REPORT

PERIODIC SSM REPORT

Reporting Period: January 01, 2015 through June 30, 2015

Contact Person: Scott McGoldrick
Manager, Environmental Compliance
Keystone Cement Company
Route 329
P.O. Box A
Bath, PA 18014-0058
Phone: (610) 837-1881 ext. 3213

Actions taken during this reporting period in response to excess emission events caused by a malfunction were consistent with the SSM Plan. These events are listed below in Table 1.

TABLE 1 - STARTUP, SHUTDOWN, AND MALFUNCTIONS WHERE SSM PLAN WAS FOLLOWED

Date	Subject Unit	Parameter	Description	Duration (min)	Corrective Action
4/20/2015	Clinker Cooler	Visible Emissions	High temperature in clinker cooler fan (441-FN-10) caused by kiln push that resulted in both visible emissions and excess emissions from the clinker cooler.	16	Material cleared from cooler/screw conveyor while kiln taken offline (kiln feed suspended). Cooler fan allowed to reset (cooled). Restarted to normal operation.
4/20/2015	Clinker Cooler	Visible Emissions	Kiln push caused overload (excess material) into screw conveyor (441-SC-05). The event resulted in both visible emissions and excess emissions from the clinker cooler.	23	Kiln taken offline. Emptied clinker cooler conveyor (manual operation) until empty and then returned system to normal operation. Additional action: Evaluate motor of possible full load amp overload issues.
4/21/2015	Clinker Cooler	Visible Emissions	Kiln push caused overload (excess material) into screw conveyor (441-SC-05). The event resulted in both visible emissions and excess emissions from the clinker cooler.	15	Kiln taken offline. Emptied clinker cooler conveyor (manual operation) until empty and then returned system to normal operation.
4/21/2015	Clinker Cooler	Visible Emissions	Screw conveyor (441-SC-05) choke. Incident believed related to earlier incident; resulting in visible emissions from clinker cooler. However, no CEMS excess emissions were recorded.	30	Emptied clinker cooler conveyor. Work order (WO #247091) for electrical and mechanical evaluation of motor (and screw) for amp overload. Screw cleared and proper motor function confirmed. System put back into full service.
4/22/2015	Finish Material, Bins, Conveyors, and Feeders	Visible Emissions	Pickup from clinker handling feeder/belt bag filter (512-BF-06) was not providing adequate dedusting at pickups from belt conveyors (512-BC-01 & 512-BC-02).	30	Clinker handling system turned off for system inspection. Work order (WO #247225), which confirmed blockage of pickups for noted conveyors. Cleared blockage and confirmed operation of bag filter and associated handling system. Returned to service.
4/24/2015	Raw Material System Conveyors & Elevators	Visible Emissions	A choke in raw mill bucket elevator (321-BE-01), resulted in emissions.	5	Material was cleared from the bucket elevator chute and proper operation was restored.
4/27/2015	Raw Material Rejects Systems	Visible Emissions	Raw material was rejected to the discharge bin as a result of oversized material and/or scrap metal within feed.	3	Slow down process and evaluate feed. Drop chute cleared and returned to normal operation.
5/1/2015	Clinker Cooler	Visible Emissions	Kiln push caused overload into screw conveyor (441-SC-05). The event resulted in both visible emissions from clinker cooler and excess emissions from the clinker cooler.	15	Kiln taken offline. Emptied clinker cooler conveyor and returned system to normal operation.

TABLE 1 - STARTUP, SHUTDOWN, AND MALFUNCTIONS WHERE SSM PLAN WAS FOLLOWED

Date	Subject Unit	Parameter	Description	Duration (min)	Corrective Action
5/2/2015	Clinker Cooler	Visible Emissions	Kiln push caused high temperatures in the clinker cooler dust collector. The high temperatures triggered the opening of clinker cooler air damper after the fan shut down, resulting in fugitive emissions from the clinker cooler.	35	After material cleared, the fan was restarted with bleed in damper open. No excess emissions recorded from clinker cooler dust collector during event.
5/2/2015	Finish Material Bins, Conveyors, and Feeders	Visible Emissions	Additive bin bag filter fan (512-FN-06) was not functioning. Upon manual pulsing of equipment the screw conveyor (512-SC-02) was found to be stalled out, resulting in fugitive emissions.	10	Opened dust collector and completed an internal inspection, which found a bad/torn bag in the collector. Work order initiated that included change out of the torn bag and cleared material from the wall and photohelic tube. Tested equipment and returned to service.
5/8/2015	Raw Material Rejects System	Visible Emissions	During startup of raw mill, material that had accumulated on the feed belt conveyor (311-BC) was diverted to the rejects bin/discharge causing fugitive emissions. Dusting from incident remained on property until system emptied.	7	Once empty, fugitive dust eliminated. In future, have all operators clear feed belt during mill shutdown to avoid issue upon restarting.
5/10/2015	Clinker Cooler	Visible Emissions	Following kiln shutdown, restarted clinker cooler system to remove accumulated solids from cooler. Ramp up of fan/baghouse exhaust caused short term visible emissions at clinker cooler dust collector stack.	25	Shutdown system, checked baghouse, and initiated work order for baghouse inspection (WO #248084).
5/23/2015	Clinker Cooler	Visible Emissions	Kiln push caused overload to clinker cooler dust collector. The overload caused the screw conveyors to choke and shutdown resulting in fugitive emissions.	20	Kiln was taken offline to clear choked equipment. Once issue was addressed the kiln was brought back online.
5/23/2015	Clinker Elevator, Drag Belt, and Silo Storage	Visible Emissions	During startup of kiln, visible emissions were observed coming out of the top of the clinker silos.	6	Changed air flow on the kiln which alleviated dusting at clinker silos.
5/27/2015	Raw Meal Elevators & Air Slide Conveyor	Visible Emissions	A wear hole developed in the top of the raw mill air slide (351-AS-02) which feeds the preheater tower from bucket elevator (351-BE-01). The hole in the air slide resulted in fugitive emissions of dust from the feed materials.	10	The air slide was temporarily repaired by wrapping with fabric and duct tape. A work order (WO #248993) was entered to weld a plate over the hole and the permanent repair was completed. The work order was closed on 5/28/2015.
6/10/2015	Raw Meal Elevators & Air Slide Conveyor	Visible Emissions	A valve became stuck on the CF silo air slide causing visible dust emissions.	10	Manually shut valve, shutdown blowers, and repaired valve.
6/15/2015	Clinker Cooler	Visible Emissions	Kiln push resulted in a high temperature in clinker cooler causing the CCDC fan (441-FN-10) to shut off. The kiln push resulted in visible emissions from clinker cooler.	10	Material cleared from cooler while kiln taken offline. Cooler fan allowed to reset. Restarted to normal operation.
6/16/2015	Hydrated Lime System	Visible Emissions	The automated system utilized to fill the lime bin malfunctioned causing overfilling of the bin which resulted in fugitive emissions.	5	Blower fan was turned off and the PLC was reprogrammed to correct automation issue.